

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ZAVIUS AVERETTE,
Plaintiff,

2:06-CV-399-MHT

v

LT. COPELAND, et al.,
Defendants,

PLAINTIFF'S INITIAL DISCLOSURE

comes now, Zavius Averette, prose pursuant to Rule 26 (a)(1) of the R. Civ. P., and Local Rule 26.1 of the U.S. District Court, provides the following initial disclosures:

(A) Witness

Zavius Averette
#214905-G3/D-145
1000 ST. Clair Rd.
Springville, AL 35146

Mr. Zavius Averette is the plaintiff in this matter and has knowledge of the allegations contained in his complaint. Zmate Reginald Knight AKA # ~~182887~~ are witnesses to plaintiff's claims and have knowledge to or of the allegations contained in plaintiff's complaint.

LT. COPELAND
C.O.Z. Lotimore

Nurse Mary Nelson

Nurse Brenda Parnell

C.O.E. Kendrick

are believed to have information regarding the treatment of state correctional facility. . .

Any person subsequently referred to in plaintiff's deposition, the defendants' depositions, the depositions of any witnesses, the plaintiff's responses to request for production of documents, the defendants' answers to interrogatories and defendants' responses to request for production of documents. . .

(2.) Relevant Documents;

All documents referred in defendants' initial disclosures and any supplemental disclosures.

Plaintiff's institutional files - Plaintiff's medical files
The institutional files and personnel files of all defendants, all documents, pursuant to local Rule 26(1)(B) and the Federal Rules of Civil Procedures that are in the defendants' possession, custody or control that may be used by the plaintiff (other than solely for impeachment purposes). To support the plaintiff's claims and for contention and refute the defendants' defenses are available for copying and inspection. . .

~~CERTIFICATE OF SERVICE~~

I hereby certify that I have this 20 day of OCT, 2006.
served a copy of the foregoing on defendants counsel,
by placing same in the United States Mail, postage
pre-paid and addressed as follows;

Staff Attorneys
Benjamin H. Albritton
Richard B. Garrett
P.O. Box 270
Montgomery, 36101-0270

CLERK OF COURT
United States District Court
P.O. Box 411
Montgomery, AL 36101-0411

Zavious Averett
Plaintiff pro se
1000 St. Clair, 2nd.
Springville, AL 35146